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September 3, 2019

VIA ECFS

The Honorable Jane Hinckley-Halprin
Administrative Law Judge
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Entertainment Media Trust
Status Report
MB Docket No. 19-156**

Dear Judge Halprin:

Entertainment Media Trust (“EMT”), by counsel, files this status report regarding the captioned matter.

On August 20, 2019, the Enforcement Bureau (“Bureau”) filed its First Request for Production of Documents to Entertainment Media Trust, Dennis J. Watkins, Trustee (“Document Request”) and its First Set of Interrogatories to Entertainment Media Trust, Dennis J. Watkins, Trustee (“First Interrogatories”) on EMT. Both the Document Request and First Interrogatories are voluminous, with seventy-nine (79) requests for production and ninety-two (92) interrogatories, respectively. Notwithstanding these substantial requests, EMT is in the process of preparing responses to the Document Request and the First Interrogatories.

EMT filed a Motion for Extension of Time (“August 30 Motion”) to respond to the Document Request on August 30, 2019, because the scope of the Document Request and the First Interrogatories made it impossible for EMT to respond within the timeframe contemplated by the Commission’s rules. In addition to the significant burden placed upon EMT by receiving both discovery requests on the same day and each having extremely short turnarounds, Paul Lauber has been out of the country and unavailable. Lauber prepared a number of the documents requested in the Document Request and about which the Bureau propounded interrogatories; therefore, his assistance in preparing the responses is critical. Lauber returned to the United States on September 2, 2019. For similar reasons, EMT filed a Motion for Extension of Time to respond to the First Interrogatories on September 3, 2019 (“September 3 Motion”).

As described in EMT’s August 30 Motion and September 3 Motion, EMT has also engaged the Bureau in discussions to settle this matter prior to hearing. EMT believes these discussions further the public interest because they may lead to resolution of this matter more quickly,

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minimizing the burdens on the Commission and the parties of a full hearing process. Finally, as a result of this proceeding, EMT has been forced to consider filing bankruptcy. It is meeting with bankruptcy counsel today to evaluate its options. While filing bankruptcy typically would stay such a proceeding, EMT believes bankruptcy protection may serve toward reaching an expedited resolution of this matter under existing Commission policy.

Should you have any questions regarding this matter, please feel free to contact the undersigned.

Respectfully submitted,

/s/ Davina S. Sashkin
Davina S. Sashkin

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